

Exhibit 2

From: [Stephen Stern](#)
To: [Douglas Hofstedt](#)
Cc: [Heather Yeung](#)
Subject: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, September 30, 2021 4:22:24 PM
Attachments: [image001.png](#)

Doug:

Thank you for speaking with me earlier today. As we discussed, I have a case where there are depositions of two witnesses we like to have pass through the security apparatus at the courthouse. We are looking to take those depositions October 19, 20, or 21 (two of those three days). Can we secure a room at the courthouse for these depositions? Ideally, the room would be able to accommodate up eight individuals (although I think in all likelihood, we would have up to five or six individuals in the room).

If you have any questions, please let me know.

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: [Stephen Stern](#)
To: [Douglas Hofstedt](#); [Quinika Hawkins](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 11:02:26 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

I consider each of these three individuals to pose potential security threats. I do not anticipate any other witness in this case posing such a threat.



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Thursday, October 28, 2021 10:59 AM
To: Stephen Stern <Stern@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

We are only doing this for witnesses for whom there is a security concern. Please advise.

Douglas M. Hofstedt, Court Administrator

Circuit Court for Anne Arundel County

8 Church Circle, Annapolis, MD 21401

410-222-1404 www.circuitcourt.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, October 28, 2021 10:55 AM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Douglas Hofstedt

From: [Douglas Hofstedt](#)
To: [Stephen Stern](#)
Cc: [Heather Yeung](#); [Quinika Hawkins](#)
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Friday, October 1, 2021 11:08:27 AM
Attachments: [image001.png](#)

This request has been approved. The room will be located on the 4th floor (top floor) of the Circuit Court for Anne Arundel County, 8 Church Circle, Annapolis, MD 21401 - Conference Room 407. Currently all three dates are available (October 19, 20, or 21). Please confirm which two of these you will work best. That room seats up to 12 people. Everyone will be required to wear a mask the entire time in the Circuit Court building.

Thanks in advance and we look forward to hearing from you to confirm dates and times.

Doug

Douglas M. Hofstedt, Court Administrator
Circuit Court for Anne Arundel County
8 Church Circle, Annapolis, MD 21401
410-222-1404 www.circuitcourt.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, September 30, 2021 4:21 PM
To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Doug:

Thank you for speaking with me earlier today. As we discussed, I have a case where there are depositions of two witnesses we like to have pass through the security apparatus at the courthouse. We are looking to take those depositions October 19, 20, or 21 (two of those three days). Can we secure a room at the courthouse for these depositions? Ideally, the room would be able to accommodate up eight individuals (although I think in all likelihood, we would have up to five or six individuals in the room).

If you have any questions, please let me know.

Thank you,
Stephen

Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC

From: [Stephen Stern](#)
To: [Douglas Hofstedt](#); [Quinika Hawkins](#)
Cc: [Heather Yeung](#)
Subject: [EXTERNAL] Rescheduling Depositions
Date: Wednesday, November 10, 2021 4:22:14 PM
Attachments: [image001.png](#)

Doug and Quinika:

One of the witnesses that we want to depose at the courthouse for security reasons (who has canceled his deposition unilaterally on multiple occasions) has now requested doing his deposition on November 29. Is that date available?

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: [Douglas Hofstedt](#)
To: [Stephen Stern](#); [Quinika Hawkins](#)
Cc: [Heather Yeung](#)
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 10:58:49 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

We are only doing this for witnesses for whom there is a security concern. Please advise.

Douglas M. Hofstedt, Court Administrator
Circuit Court for Anne Arundel County
8 Church Circle, Annapolis, MD 21401
410-222-1404 www.circuitcourt.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, October 28, 2021 10:55 AM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Also, does November 22 work for a different witness (there are three that are all related (father-son and uncle) that I would like to take in the courthouse – the third witness just became relevant with some new information we obtained)?

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Sent: Thursday, October 28, 2021 10:39 AM

From: [Quinika Hawkins](#)
To: [Douglas Hofstedt](#); [Stephen Stern](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 11:00:13 AM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image001.png](#)

November 22nd is not available.

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Thursday, October 28, 2021 10:59 AM
To: Stephen Stern <Stern@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

We are only doing this for witnesses for whom there is a security concern. Please advise.

Douglas M. Hofstedt, Court Administrator

Circuit Court for Anne Arundel County

8 Church Circle, Annapolis, MD 21401

410-222-1404 www.circuitcourt.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, October 28, 2021 10:55 AM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Also, does November 22 work for a different witness (there are three that are all related (father-son and uncle) that I would like to take in the courthouse – the third witness just became relevant with some new information we obtained)?

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Sent: Thursday, October 28, 2021 10:39 AM
To: Stephen Stern <Stern@kaganstern.com>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Yes – that works

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, October 28, 2021 10:05 AM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>

To: Stephen Stern <Stern@kaganstern.com>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Yes – that works

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cshawk00@aacounty.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, October 28, 2021 10:05 AM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Ok – what about November 3?

Thanks,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Sent: Thursday, October 28, 2021 9:41 AM

To: Stephen Stern <Stern@kaganstern.com>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

November 4th is available.

November 5th is not available.

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aaacounty.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Wednesday, October 27, 2021 8:22 PM
To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

One of the witnesses has now asked about November 4 and November 5. Please let me know whether either or both of these days works.

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Stephen Stern

Sent: Tuesday, October 19, 2021 7:57 PM

To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>

Cc: Heather Yeung <yeung@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>

Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

The deponent for Thursday (October 21) unilaterally cancelled the deposition. Unfortunately, this is going to be an ongoing issue with these two witnesses, as we are expecting them to resist being deposed as much as possible, even though the court has already denied the motions to quash the subpoenas. I will follow up with a new date for this deponent shortly.

In the meantime, we are still on (for the moment) with the deposition for Monday (I would not be surprised if that deponent tries to cancel again at the last minute).

Thank you,
Stephen



Stephen B. Stern, Esq.

stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC

(410) 793-1610 (direct)

(410) 216-7900, ext. 1009

(410) 705-0836 (fax)

238 West Street

Annapolis, Maryland 21401

www.kaganstern.com

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>

Sent: Friday, October 1, 2021 11:08 AM

To: Stephen Stern <Stern@kaganstern.com>

Cc: Heather Yeung <yeung@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>

Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

This request has been approved. The room will be located on the 4th floor (top floor) of the Circuit Court for Anne Arundel County, 8 Church Circle, Annapolis, MD 21401 - Conference Room 407. Currently all three dates are available (October 19, 20, or 21). Please confirm which two of these you will work best. That room seats up to 12 people. Everyone will be required to wear a mask the entire time in the Circuit Court building.

From: [Stephen Stern](#)
To: [Douglas Hofstedt](#); [Quinika Hawkins](#)
Cc: [Heather Yeung](#)
Subject: [EXTERNAL] RE: Rescheduling Depositions
Date: Wednesday, November 10, 2021 8:07:02 PM
Attachments: [image001.png](#)

There are now multiple dates for consideration by this witness. Please advise if the court is available for the deposition on the following dates:

November 18, November 29, and/or December 1.

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Stephen Stern
Sent: Wednesday, November 10, 2021 4:22 PM
To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Rescheduling Depositions

Doug and Quinika:

One of the witnesses that we want to depose at the courthouse for security reasons (who has canceled his deposition unilaterally on multiple occasions) has now requested doing his deposition on November 29. Is that date available?

Thank you,
Stephen

Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC

From: [Quinika Hawkins](#)
To: [Heather Yeung](#); [Stephen Stern](#); [Douglas Hofstedt](#)
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, November 4, 2021 10:03:34 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Thank you for letting us know.

From: Heather Yeung <yeung@kaganstern.com>
Sent: Wednesday, November 3, 2021 2:16 PM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Stephen Stern <Stern@kaganstern.com>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Quinika and Douglas,

Unfortunately the deposition scheduled for tomorrow is going to be postponed. The deponent finally retained counsel, so we hope that this will be the last rescheduling of this one.

Thanks,



Heather K. Yeung, Esq.
yeung@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 216-7900 x1017
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Sent: Thursday, October 28, 2021 11:10 AM
To: Stephen Stern <Stern@kaganstern.com>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Yes, that works as well.

Other Available Dates:

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Thursday, October 28, 2021 10:59 AM
To: Stephen Stern <Stern@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

We are only doing this for witnesses for whom there is a security concern. Please advise.

Douglas M. Hofstedt, Court Administrator

Circuit Court for Anne Arundel County

8 Church Circle, Annapolis, MD 21401

410-222-1404 www.circuitcourt.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, October 28, 2021 10:55 AM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Also, does November 22 work for a different witness (there are three that are all related (father-son and uncle) that I would like to take in the courthouse – the third witness just became relevant with some new information we obtained)?

Thank you,
Stephen

Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com



From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Sent: Thursday, October 28, 2021 11:00 AM
To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>; Stephen Stern <Stern@kaganstern.com>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

November 22nd is not available.

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Thursday, October 28, 2021 10:59 AM
To: Stephen Stern <Stern@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

We are only doing this for witnesses for whom there is a security concern. Please advise.

Douglas M. Hofstedt, Court Administrator
Circuit Court for Anne Arundel County
8 Church Circle, Annapolis, MD 21401

From: [Quinika Hawkins](#)
To: [Stephen Stern](#); [Douglas Hofstedt](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 11:10:11 AM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image002.png](#)

Yes, that works as well.

Other Available Dates:

November 2-4

November 23-26

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, October 28, 2021 11:03 AM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

What about November 23?

Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: [Stephen Stern](#)
To: [Quinika Hawkins](#); [Douglas Hofstedt](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 10:55:32 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Also, does November 22 work for a different witness (there are three that are all related (father-son and uncle) that I would like to take in the courthouse – the third witness just became relevant with some new information we obtained)?

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Sent: Thursday, October 28, 2021 10:39 AM
To: Stephen Stern <Stern@kaganstern.com>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Yes – that works

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: [Quinika Hawkins](#)
To: [Stephen Stern](#); [Douglas Hofstedt](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 10:38:44 AM
Attachments: [image003.png](#)
[image004.png](#)
[image005.png](#)
[image002.png](#)

Yes – that works

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, October 28, 2021 10:05 AM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Ok – what about November 3?

Thanks,
Stephen



**KAGAN
STERN**

Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: [Stephen Stern](#)
To: [Quinika Hawkins](#); [Douglas Hofstedt](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 10:05:03 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Ok – what about November 3?

Thanks,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Sent: Thursday, October 28, 2021 9:41 AM
To: Stephen Stern <Stern@kaganstern.com>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

November 4th is available.

November 5th is not available.

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: [Quinika Hawkins](#)
To: [Stephen Stern](#)
Cc: [Douglas Hofstedt](#); [Heather Yeung](#)
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Wednesday, October 20, 2021 6:12:29 AM
Attachments: [image001.png](#)

Good Morning,

Thank you for the update.

Nika

Sent from my iPhone

On Oct 19, 2021, at 7:57 PM, Stephen Stern <Stern@kaganstern.com> wrote:

The deponent for Thursday (October 21) unilaterally cancelled the deposition. Unfortunately, this is going to be an ongoing issue with these two witnesses, as we are expecting them to resist being deposed as much as possible, even though the court has already denied the motions to quash the subpoenas. I will follow up with a new date for this deponent shortly.

In the meantime, we are still on (for the moment) with the deposition for Monday (I would not be surprised if that deponent tries to cancel again at the last minute).

Thank you,
Stephen

[image001.png](#) **Stephen B. Stern, Esq.**
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Friday, October 1, 2021 11:08 AM

From: [Stephen Stern](#)
To: [Douglas Hofstedt](#)
Cc: [Heather Yeung](#); [Quinika Hawkins](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Wednesday, October 13, 2021 12:18:26 PM
Attachments: [image001.png](#)

Doug:

I have been told one deponent will not appear on October 19. I am trying to reschedule for October 25. Please advise as to whether the conference room is available that day.

Also, opposing counsel would like to participate via video. Will I be able to connect to a wi-fi network so I can have the opposing attorney participate via Teams or some other video technology?

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Friday, October 1, 2021 11:08 AM
To: Stephen Stern <Stern@kaganstern.com>
Cc: Heather Yeung <yeung@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

This request has been approved. The room will be located on the 4th floor (top floor) of the Circuit Court for Anne Arundel County, 8 Church Circle, Annapolis, MD 21401 - Conference Room 407. Currently all three dates are available (October 19, 20, or 21). Please confirm which two of these you will work best. That room seats up to 12 people. Everyone will be required to wear a mask the entire time in the Circuit Court building.

<Douglas.Hofstedt@mdcourts.gov>

Cc: Heather Yeung <yeung@kaganstern.com>

Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Also, does November 22 work for a different witness (there are three that are all related (father-son and uncle) that I would like to take in the courthouse – the third witness just became relevant with some new information we obtained)?

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>

Sent: Thursday, October 28, 2021 10:39 AM

To: Stephen Stern <Stern@kaganstern.com>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>

Cc: Heather Yeung <yeung@kaganstern.com>

Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Yes – that works

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: [Stephen Stern](#)
To: [Douglas Hofstedt](#)
Cc: [Heather Yeung](#); [Quinika Hawkins](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Friday, October 1, 2021 2:43:04 PM
Attachments: [image001.png](#)

Thank you

Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Friday, October 1, 2021 11:08 AM
To: Stephen Stern <Stern@kaganstern.com>
Cc: Heather Yeung <yeung@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

This request has been approved. The room will be located on the 4th floor (top floor) of the Circuit Court for Anne Arundel County, 8 Church Circle, Annapolis, MD 21401 - Conference Room 407. Currently all three dates are available (October 19, 20, or 21). Please confirm which two of these you will work best. That room seats up to 12 people. Everyone will be required to wear a mask the entire time in the Circuit Court building.

Thanks in advance and we look forward to hearing from you to confirm dates and times.

Doug

Douglas M. Hofstedt, Court Administrator

Circuit Court for Anne Arundel County

8 Church Circle, Annapolis, MD 21401

From: [Douglas Hofstedt](#)
To: [Stephen Stern](#); [Quinika Hawkins](#)
Cc: [Heather Yeung](#)
Subject: Re: [EXTERNAL] RE: Rescheduling Depositions
Date: Friday, November 12, 2021 11:38:12 AM
Attachments: [image001.png](#)

I had someone else I my office check the dates.

Suite 407

Nov. 18 – Open

Nov. 29 – Not avail. (Drug Court)

Dec. 1 - Open

From: Stephen Stern <Stern@kaganstern.com>
Sent: Wednesday, November 10, 2021 8:06:55 PM
To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: [EXTERNAL] RE: Rescheduling Depositions

There are now multiple dates for consideration by this witness. Please advise if the court is available for the deposition on the following dates:

November 18, November 29, and/or December 1.

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Stephen Stern
Sent: Wednesday, November 10, 2021 4:22 PM
To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>

From: [Stephen Stern](#)
To: [Douglas Hofstedt](#); [Quinika Hawkins](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] RE: Rescheduling Depositions
Date: Friday, November 12, 2021 1:40:52 PM
Attachments: [image001.png](#)

Thank you. I will circle back as soon as I am able to confirm.

Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Friday, November 12, 2021 11:38 AM
To: Stephen Stern <Stern@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Re: [EXTERNAL] RE: Rescheduling Depositions

I had someone else I my office check the dates.

Suite 407

Nov. 18 – Open

Nov. 29 – Not avail. (Drug Court)

Dec. 1 - Open

From: Stephen Stern <Stern@kaganstern.com>
Sent: Wednesday, November 10, 2021 8:06:55 PM
To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: [EXTERNAL] RE: Rescheduling Depositions

There are now multiple dates for consideration by this witness. Please advise if the court is available for the deposition on the following dates:

November 18, November 29, and/or December 1.

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Stephen Stern

Sent: Wednesday, November 10, 2021 4:22 PM

To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>; Quinika Hawkins
<Quinika.Hawkins@mdcourts.gov>

Cc: Heather Yeung <yeung@kaganstern.com>

Subject: Rescheduling Depositions

Doug and Quinika:

One of the witnesses that we want to depose at the courthouse for security reasons (who has canceled his deposition unilaterally on multiple occasions) has now requested doing his deposition on November 29. Is that date available?

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: [Stephen Stern](#)
To: [Douglas Hofstedt](#); [Quinika Hawkins](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] RE: Rescheduling Depositions
Date: Friday, November 12, 2021 3:06:02 PM
Attachments: [image001.png](#)

I just confirmed December 1. Please reserve the conference room for that day.

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Friday, November 12, 2021 11:38 AM
To: Stephen Stern <Stern@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Re: [EXTERNAL] RE: Rescheduling Depositions

I had someone else I my office check the dates.

Suite 407
Nov. 18 – Open
Nov. 29 – Not avail. (Drug Court)
Dec. 1 - Open

From: Stephen Stern <Stern@kaganstern.com>
Sent: Wednesday, November 10, 2021 8:06:55 PM
To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: [EXTERNAL] RE: Rescheduling Depositions

There are now multiple dates for consideration by this witness. Please advise if the court is

available for the deposition on the following dates:

November 18, November 29, and/or December 1.

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Stephen Stern

Sent: Wednesday, November 10, 2021 4:22 PM

To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>; Quinika Hawkins
<Quinika.Hawkins@mdcourts.gov>

Cc: Heather Yeung <yeung@kaganstern.com>

Subject: Rescheduling Depositions

Doug and Quinika:

One of the witnesses that we want to depose at the courthouse for security reasons (who has canceled his deposition unilaterally on multiple occasions) has now requested doing his deposition on November 29. Is that date available?

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Stephen Stern <Stern@kaganstern.com>

Sent: Thursday, September 30, 2021 4:21 PM

To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>

Cc: Heather Yeung <yeung@kaganstern.com>

Subject: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Doug:

Thank you for speaking with me earlier today. As we discussed, I have a case where there are depositions of two witnesses we like to have pass through the security apparatus at the courthouse. We are looking to take those depositions October 19, 20, or 21 (two of those three days). Can we secure a room at the courthouse for these depositions? Ideally, the room would be able to accommodate up eight individuals (although I think in all likelihood, we would have up to five or six individuals in the room).

If you have any questions, please let me know.

Thank you,
Stephen



Stephen B. Stern, Esq.

stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC

(410) 793-1610 (direct)

(410) 216-7900, ext. 1009

(410) 705-0836 (fax)

238 West Street

Annapolis, Maryland 21401

www.kaganstern.com

From: [Quinika Hawkins](#)
To: [Douglas Hofstedt](#); [Stephen Stern](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 11:00:13 AM
Attachments: [image006.png](#)
[image007.png](#)
[image008.png](#)
[image001.png](#)

November 22nd is not available.

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Thursday, October 28, 2021 10:59 AM
To: Stephen Stern <Stern@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

We are only doing this for witnesses for whom there is a security concern. Please advise.

Douglas M. Hofstedt, Court Administrator

Circuit Court for Anne Arundel County

8 Church Circle, Annapolis, MD 21401

410-222-1404 www.circuitcourt.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, October 28, 2021 10:55 AM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

From: [Stephen Stern](#)
To: [Douglas Hofstedt](#); [Quinika Hawkins](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 11:02:26 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

I consider each of these three individuals to pose potential security threats. I do not anticipate any other witness in this case posing such a threat.



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Sent: Thursday, October 28, 2021 10:59 AM
To: Stephen Stern <Stern@kaganstern.com>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Re: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

We are only doing this for witnesses for whom there is a security concern. Please advise.

Douglas M. Hofstedt, Court Administrator

Circuit Court for Anne Arundel County

8 Church Circle, Annapolis, MD 21401

410-222-1404 www.circuitcourt.org

From: Stephen Stern <Stern@kaganstern.com>
Sent: Thursday, October 28, 2021 10:55 AM
To: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>; Douglas Hofstedt

<Douglas.Hofstedt@mdcourts.gov>

Cc: Heather Yeung <yeung@kaganstern.com>

Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Also, does November 22 work for a different witness (there are three that are all related (father-son and uncle) that I would like to take in the courthouse – the third witness just became relevant with some new information we obtained)?

Thank you,

Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>

Sent: Thursday, October 28, 2021 10:39 AM

To: Stephen Stern <Stern@kaganstern.com>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>

Cc: Heather Yeung <yeung@kaganstern.com>

Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Yes – that works

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cshawk00@aacounty.org

From: [Stephen Stern](#)
To: [Quinika Hawkins](#); [Douglas Hofstedt](#)
Cc: [Heather Yeung](#)
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 10:55:32 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Also, does November 22 work for a different witness (there are three that are all related (father-son and uncle) that I would like to take in the courthouse – the third witness just became relevant with some new information we obtained)?

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Sent: Thursday, October 28, 2021 10:39 AM
To: Stephen Stern <Stern@kaganstern.com>; Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

Yes – that works

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: Stephen Stern
To: Quinika Hawkins; Douglas Hofstedt
Cc: Heather Yeung
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court
Date: Thursday, October 28, 2021 11:02:46 AM
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

What about November 23?



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Sent: Thursday, October 28, 2021 11:00 AM
To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>; Stephen Stern <Stern@kaganstern.com>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: RE: [EXTERNAL] Request for Depositions to be Conducted at Anne Arundel County Circuit Court

November 22nd is not available.

Quinika (Nika) Hawkins
Court Administration Office Manager
Office of the Court Administrator
Anne Arundel County Circuit Court
(410)-222-1404
8 Church Circle
Annapolis, MD 21401
quinika.hawkins@mdcourts.gov
cthawk00@aacounty.org

From: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>

From: [Stephen Stern](#)
To: [Douglas Hofstedt](#); [Quinika Hawkins](#)
Cc: [Heather Yeung](#)
Subject: [EXTERNAL] RE: Rescheduling Depositions
Date: Wednesday, November 10, 2021 8:07:02 PM
Attachments: [image001.png](#)

There are now multiple dates for consideration by this witness. Please advise if the court is available for the deposition on the following dates:

November 18, November 29, and/or December 1.

Thank you,
Stephen



Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC
(410) 793-1610 (direct)
(410) 216-7900, ext. 1009
(410) 705-0836 (fax)
238 West Street
Annapolis, Maryland 21401
www.kaganstern.com

From: Stephen Stern
Sent: Wednesday, November 10, 2021 4:22 PM
To: Douglas Hofstedt <Douglas.Hofstedt@mdcourts.gov>; Quinika Hawkins <Quinika.Hawkins@mdcourts.gov>
Cc: Heather Yeung <yeung@kaganstern.com>
Subject: Rescheduling Depositions

Doug and Quinika:

One of the witnesses that we want to depose at the courthouse for security reasons (who has canceled his deposition unilaterally on multiple occasions) has now requested doing his deposition on November 29. Is that date available?

Thank you,
Stephen

Stephen B. Stern, Esq.
stern@kaganstern.com

Kagan Stern Marinello & Beard, LLC